

# Kasell Law Firm

September 25, 2023

Hon. Paul A. Engelmayer  
United States District Judge  
United States District Court  
40 Foley Square, Room 2201  
New York, NY 10007

Re: *Ka-Lai Wong v. I.A.T.S.E.*, 23 Civ. 7629 (PAE)

Judge Engelmayer:

Pursuant to Part 1(E) of this Court's Individual Rules, I write to request an extension to file an amended complaint on behalf of Plaintiff Ka-Lai Wong in the above-captioned action and represent the following:

- (1) the original due date is tomorrow, September 26, 2023, and Plaintiff requests a three-week extension until October 17, 2023;
- (2) No previous request for an extension of time has been made; and
- (3) Opposing counsel has consented to the request for the extension.

In addition, as the Court had previously set the due date for Defendant to respond to the amended complaint by October 10, 2023 – *i.e.*, (1) file an answer; (2) file a new motion to dismiss; or (3) submit a letter to the Court, copying plaintiff, stating that they rely on the previously filed motion to dismiss – Plaintiff request that this date be moved to October 31, 2023.

The reason for this request is that I was retained today to represent Plaintiff Ka-Lai Wong in the above-captioned action and otherwise assist lead counsel, Edward Hayes (who appeared in the state court prior to removal) in the filing of an amended complaint as well as any opposition to a motion to dismiss, and I will need time to review the file and conduct the appropriate research to draft the amended pleading.

Respectfully,

/s/ David Kasell  
David Kasell

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